8 Response to Comments

8.1 Introduction

The Draft EIR was distributed for public review from January 6, 2020, through February 20, 2020, pursuant to CEQA Guidelines Section 15105. Comments received throughout the 45-day public comment period included six letters. According to CEQA Guidelines Section 15088(a), “the lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response.” In accordance with CEQA Guidelines Section 15132(d), the Final EIR shall consist of responses to significant environmental points raised in the review and consultation process. Section 8.3 provides responses to all written comments received during the public comment period.

8.2 Comments on the Draft EIR

During the 45-day comment period, which began January 6, 2020 and closed February 20, 2020, six letters were received. The comment letters are listed in Table 8-1.

Table 8-1. List of Agencies and Organizations that Commented on the Draft EIR

<table>
<thead>
<tr>
<th>Letter</th>
<th>Commenter</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>A1</td>
<td>California Air Resources Board</td>
<td>February 19, 2020</td>
</tr>
<tr>
<td>A2</td>
<td>City of Signal Hill</td>
<td>February 19, 2020</td>
</tr>
<tr>
<td>A3</td>
<td>California Department of Transportation (Caltrans)</td>
<td>February 20, 2020</td>
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<tr>
<td>A4</td>
<td>South Coast Air Quality Management District</td>
<td>February 20, 2020</td>
</tr>
<tr>
<td>O1</td>
<td>Gabrieleno Band of Mission Indians – Kizh Nation</td>
<td>January 10, 2020</td>
</tr>
<tr>
<td>O2</td>
<td>Supporters Alliance for Environmental Responsibility</td>
<td>January 29, 2020</td>
</tr>
</tbody>
</table>

8.3 Responses to Comments on the Draft EIR

Responses to agencies and organizations that commented on the Draft EIR are included below. A copy of each letter with bracketed comment numbers on the right margin is followed by the response for each comment as indexed in the letter. Any changes to the Draft EIR are documented by showing deletions with strikethrough and additions with underline.
February 19, 2020

Scott Kinsey, Planner
City of Long Beach
411 West Ocean Boulevard
Long Beach, California 90802

Dear Scott Kinsey:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Spring Street Business Park Project (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2019100514. The project includes the development of three new industrial buildings totaling 160,073 square feet. The proposed industrial buildings will not include space used for cold storage. Once in operation, the Project would introduce up to 631 daily vehicle trips, including up to 126 daily heavy-duty truck trips, along local roadways. The Project is located within the City of Long Beach (City), California, which is the lead agency for California Environmental Quality Act (CEQA) purposes.

CARB submitted comments on the Notice of Preparation (NOP) for the DEIR released in October 2019, which is included as Attachment A of this letter. Those comments highlighted the need for a health risk assessment (HRA) to be prepared for the Project and encouraged the applicant and City to implement all existing and emerging zero-emission technologies to minimize diesel particulate matter (diesel PM) and nitrogen oxides (NOx) emissions exposure to all neighboring communities, as well as minimize the greenhouse gases that contribute to climate change. Furthermore, CARB’s comments emphasized the potential cumulative health impacts should the City allow the construction of the proposed industrial buildings near communities that score within the top 15 percent of California census tracts on the California Communities Environmental Health Screening Tool Version 3.0 (CalEnviroScreen).\(^1\) Based on CARB’s review of the DEIR, the applicant and City did not adequately address CARB’s original comments on the Project; therefore, CARB continues to be concerned about the air pollution impacts that would result should the City approve the Project.


Agency: California Air Resources Board
Letter Code: A1
Commenter: Richard Boyd
Date: February 19, 2020

A1-a This comment summarizes the project description. This comment does not raise a substantive issue on the content of the Draft EIR. The comment will be made available for the decision makers. No further response is required.

A1-b Please see response to comment A1-c regarding CARB’s request for preparation of a health risk assessment. The commenter’s encouragement of zero-emission technologies and concern for construction near communities that score within the top 15 percent of California census tracts is noted and will be made available to decision makers. No further response is required.
A1-c The comment states that the Draft EIR should have conducted a Health Risk Assessment or other quantitative analysis to evaluate health risks to sensitive receptors. The Draft EIR fully evaluated potential impacts to sensitive receptors. The proposed project’s criteria pollutant emissions, including particulate matter and oxides of nitrogen, were evaluated in Section 3.1 of the Draft EIR. The proposed project’s greenhouse gas emissions were evaluated in Section 3.3 of the Draft EIR. All of the proposed project’s anticipated emissions were determined to be below local significance thresholds and were therefore determined to be less than significant. The Draft EIR concluded that, due to the large distance between the project site and the closest sensitive receptors, which are a church (150 feet) and residences (1,200 feet), sensitive receptors would not be exposed to significant pollutant concentrations as a result of the project.

Nonetheless, pursuant to the commenter’s recommendation, the City has conducted a screening level health risk assessment using AERSCREEN (v16216) with AERMOD (v19191) to demonstrate that air emissions associated with the construction and operation of the project would not significantly impact the surrounding sensitive receptors.

**Methodology:**
AERSCREEN (v16216) and AERMOD (v19191) are currently recommended for use in health risk modeling by the California Office of Environmental Health Hazard Assessment (OEHHA). The model outputs are included as Appendix G of this EIR.

The following methods were used to calculate the diesel particulate matter concentration, and the associated health risk, from the project site:

1. The average daily particulate matter emissions from construction were calculated by dividing the total...
emissions (315.6 pounds) by the number of work days (280) to get 1.13 pounds per day.

2. The average operational trip length for the project is 12.2 miles. Due to the size of the site (7.8 acres), less than ½ mile of each trip would be generated on-site for truck movement and idling. The operational PM$_{2.5}$ emissions can be calculated by multiplying the annual emissions (0.0093 tons) by 2000 pounds/ton to get 18.6 pounds per year. The on-site emissions can be calculated by multiplying the total emissions by the percentage of time that the vehicles would be traveling on site (0.5/12.2). The total on-site PM$_{2.5}$ emissions generated during operation is 0.76 pounds per year. The operational emissions were obtained from the CalEEMod model runs that were modified to account for the high truck volumes on-site. The operational fleet mix of trucks was adjusted to 20% (default is 7.6%).

3. Section 4.3.1.1 of the Office of Environmental Health Hazard Assessment’s (OEHHA) Risk Assessment Guidelines includes the following text on the use of point sources:

   Point sources are probably the most common type of source and most air dispersion models have the capability to simulate them. Typical examples of point sources include exhaust stacks. Isolated vents from buildings are special examples of point sources.

   The only sources of on-site diesel particulate matter will be the construction equipment required to build the proposed project and the trucks that will use the facilities during operation. Therefore, the emission concentrations were calculated using a point source.

4. Consistent with Table 8.5 in OEHHA’s Risk Assessment Guidelines, the health risks at residences are calculated over a 30 year period starting with the third trimester of pregnancy and the health risks at
commercial developments are calculated over a 25 year period starting at age 18.

**Construction:**
The average daily construction emission rate was calculated using the following formula:

\[
\text{Emission Rate (grams/second)} = \frac{315.6 \text{ pounds}}{280 \text{ days}} \times \frac{453.6 \text{ grams}}{\text{pound}} \times \frac{1 \text{ day}}{24 \text{ hours}} \times \frac{1 \text{ hour}}{3,600 \text{ seconds}}
\]

\[
= 0.00592 \text{ g/s}
\]

Construction equipment would be expected to operate at various locations within the project site; however, to provide the highest source emission rate, all diesel exhaust was modeled as if it came from a single point source on the site.

At 50 meters, the distance to the closest sensitive receptor, a nearby church, the annual diesel particulate matter concentration would be 0.1158 µg/m³. Using the daily breathing rate, exposure frequency, exposure duration, averaging time, and age sensitivity factors listed in the OEHHA guidelines, the cancer risk for an individual exposed to that concentration for one year would be 0.21 in one million. This risk is below SCAQMD’s 10 in one million threshold. Furthermore, the use characteristics of many churches are not daily, but rather have gatherings of parishioners one, two or more days per week.

At 375 meters, the distance from the center of the project site to the off-site residences, the annual diesel particulate matter concentration would be 0.03040 µg/m³. Using the daily breathing rate, exposure frequency, exposure duration, averaging time, and age sensitivity factors listed in the OEHHA guidelines, the cancer risk for an individual exposed to that concentration for one year (3rd trimester through age 0.75) would be 3.6 in one million. This risk is below SCAQMD’s 10 in one million threshold.
Operations:
The average daily operation emission rate was calculated using the following formula:

\[
\text{Emission Rate (grams)} = \frac{0.76 \text{ pounds}}{365 \text{ days}} \times \frac{453.6 \text{ grams}}{1 \text{ pound}} \times \frac{1 \text{ day}}{24 \text{ hours}} \times \frac{1 \text{ hour}}{3,600 \text{ seconds}} = 0.00001093 \text{ g/s}
\]

At 50 meters, the distance to the closest sensitive receptor, a nearby church, the annual diesel particulate matter concentration would be 0.00214 µg/m³. Using the daily breathing rate, exposure frequency, exposure duration, averaging time, and age sensitivity factors listed in the OEHHA guidelines, the cancer risk for an individual exposed to that concentration for 25 years would be 0.003 in one million. This risk is below SCAQMD’s 10 in one million threshold.

At 375 meters, the distance from the center of the project site to the off-site residences, the annual diesel particulate matter concentration would be 0.0000561 µg/m³. Using the daily breathing rate, exposure frequency, exposure duration, averaging time, and age sensitivity factors listed in the OEHHA guidelines, the cancer risk for an individual exposed to that concentration for 30 years (3rd trimester through age 30) would be 0.04 in one million. This risk is below SCAQMD’s 10 in one million threshold.

Combined Risk
The combined cancer risk from construction and operation would be 3.64 in one million at the closest residences and 0.213 in one million at the church. These risks are below SCAQMD’s 10 in one million threshold. Therefore, a refined health risk assessment is not required for the proposed project.

A1-d The proposed project’s emissions were calculated using the current version of CalEEMod (Version 2016.3.2).
which uses EMFAC2014 emission rates. CalEEMod is the industry standard model for calculating the emissions from development projects. The SCAQMD specifically recommends the use of CalEEMod to estimate emissions from development projects. Therefore, use of EMFAC2017 emission rates is not warranted.
The CalEEMod model runs were updated to include the truck trips associated with 7,500 cubic yards of soil import during the grading phase, which is the anticipated amount of required import for the project. The results of the model runs are included in Appendix G of the Final EIR. Table 3.1-6 in Section 3.1, Air Quality, and Table 3.3-3 and Table 3.3-4 in Section 3.3, Greenhouse Gas Emissions, of the Final EIR have been updated to reflect the updated emission calculations. The changes had no effect on the significance determinations, and the truck trips for soil import were included in the health risk assessment modeling discussed in response to comment A1-c.

Please see response to comment A1-c for a detailed health risk assessment of the proposed project's construction and operational emissions, response to comment A1-d for a description of the models used, and response to comment A1-e for the haul truck trip emissions that were added to the grading phase. The proposed project’s air quality and GHG impacts are less than significant. Therefore, no additional mitigation measures are warranted. However, the project applicant has committed to implementing these measures. These measures have been added to Section 3.1, Air Quality, as additional measures.
This comment summarizes the contents of the letter. This comment does not raise a substantive issue on the content of the Draft EIR. The comment will be made available for the decision makers. No further response is required.

A1-g

Sincerely,

Richard Boyd, Chief
Risk Reduction Branch
Transportation and Toxics Division

Attachment

cc:  See next page.
Scott Kinsey  
February 19, 2020 
Page 5

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Sacramento, California 95812

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Stanley Armstrong  
Air Pollution Specialist  
Risk Analysis Section  
Transportation and Toxics Division
November 25, 2019

Scott Kinsey, Planner
City of Long Beach
411 West Ocean Boulevard
Long Beach, California 90802

Dear Scott Kinsey:

Thank you for providing California Air Resources Board (CARB) staff with the opportunity to comment on the Notice of Preparation (NOP) for the Spring Street Business Park Project (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2019100514. The Project consists of the construction and operation of 3 manufacturing/warehousing buildings totaling 160,673 square feet. The Project is proposed within the City of Long Beach (City), California, which is the lead agency for California Environmental Quality Act (CEQA) purposes.

CARB staff is concerned about the air pollution and health risk impacts that would result should the City approve the Project to build the proposed manufacturing/warehousing buildings. Freight facilities, such as warehouse and distribution facilities, can result in high daily volumes of heavy-duty diesel truck traffic and operation of on-site equipment (e.g., forklifts and yard tractors) that emit toxic diesel emissions, and contribute to regional air pollution and global climate change.

Existing residences are located north, south, and northwest of the Project site, with the closest residences situated approximately 1,200 feet from the Project’s northern boundary. In addition to residences, five schools (Burroughs Elementary School, Jackie Robinson Academy, Holy Innocents School, Bobbie Smith Elementary School, and Signal Hill Elementary School) are located within 1 mile of the Project. The communities near the Project are surrounded by existing toxic diesel emission sources, which include existing warehouses and other industrial uses, and vehicular traffic along Interstate 405 (I-405) and Interstate 710 (I-710). Due to the Project’s proximity to residences and schools already disproportionately burdened by multiple sources of pollution, CARB staff is concerned with the potential cumulative health impacts associated with the construction and operation of the Project.

The State of California has placed additional emphasis on protecting local communities from the harmful effects of air pollution through the passage of Assembly Bill 617 (AB 617) (Garcia, Chapter 136, Statutes of 2017). AB 617 is a significant piece of air quality legislation that highlights the need for further emission reductions in communities with high exposure burdens, like those in which the Project is located. Diesel emissions
generated during the construction and operation of the Project would negatively impact the community, which is already disproportionately impacted by air pollution from existing freight facilities.

Through its authority under Health and Safety Code, section 39711, the California Environmental Protection Agency (CalEPA) is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)). In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25 percent of the census tracts, as analyzed by the California Communities Environmental Health Screening Tool Version 3.0 (CalEnviroScreen). CalEnviroScreen uses a screening methodology to help identify California communities currently disproportionately burdened by multiple sources of pollution. Communities that score within the top 25 percent of the census tracts are exposed to higher concentrations of air pollutants and have a higher Pollution Burden. According to CalEnviroScreen, communities near the Project score within the top 15 percent of the census tracts. Therefore, CARB urges the City to ensure that the Project does not adversely impact neighboring disadvantaged communities.

The NOP does not state whether the industrial uses proposed under the Project would include cold storage warehouses. The operation of cold storage warehouses would include trucks with transport refrigeration units (TRU) that emit significantly higher levels of toxic diesel emissions, oxides of nitrogen (NOx), and greenhouse gases than trucks without TRUs. Since it is unclear whether the Project would include cold storage warehouse space, any modeling done in support of the air quality analysis of the DEIR and associated health risk assessment (HRA) should assume that a conservative percentage of the truck and trailer fleet that would be serving the Project site are equipped with TRUs.

In addition to the health risk associated with operations, construction health risks should be included in the air quality section of the DEIR and the Project’s HRA. Construction of the Project would result in short-term diesel emissions from the use of both on-road and off-road diesel equipment. The Office of Environmental Health Hazard Assessment’s (OEHHA) guidance recommends assessing cancer risks for construction projects lasting longer than two months. Since construction would very likely occur over a period lasting longer than two months, the HRA prepared for the Project should include health risks for existing residences near the Project site during construction.

The HRA prepared in support of the Project should be based on the latest OEHHA guidance (2015 Air Toxics Hot Spots Program Guidance Manual for Preparation of

1 Pollution Burden represents the potential exposure to pollutants and the adverse environmental conditions caused by pollution.
Health Risk Assessments, and the South Coast Air Quality Management District's CEQA Air Quality Handbook. The HRA should evaluate and present the existing baseline (current conditions), future baseline (full build-out year, without the Project), and future year with the Project. The health risks modeled under both the existing and the future baselines should reflect all applicable federal, state, and local rules and regulations. By evaluating health risks using both baselines, the public and City planners will have a complete understanding of the potential health impacts that would result from the Project.

To reduce the exposure of toxic diesel emissions in disadvantaged communities already disproportionally impacted by air pollution, the final design of the Project should include all existing and emerging zero-emission technologies to minimize diesel and NOx emission exposure to all neighboring communities, as well as the greenhouse gases that contribute to climate change. CARB encourages the City and applicant to implement the measures listed in Attachment A of this comment letter to reduce the Project's construction and operational air pollution emissions.

CARB staff appreciates the opportunity to comment on the NOP for the Project and can provide assistance on zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your State Clearinghouse list of selected State agencies that will receive the DEIR as part of the comment period. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist, at (916) 440-8242 or via email at stanley.armstrong@arb.ca.gov.

Sincerely,

Richard Boyd, Chief
Risk Reduction Branch
Transportation and Toxics Division

Attachment

cc: See next page.

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Scott Kinsey  
November 25, 2019  
Page 4

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ATTACHMENT A

Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers

California Air Resources Board (CARB) staff recommends developers and government planners use all existing and emerging near-zero to zero-emission technologies during project construction and operation to minimize public exposure to air pollution. Below are some measures currently recommend by CARB staff, specific to warehouse and distribution center projects. These recommendations are subject to change as new zero-emission technologies become available.

Recommended Construction Measures

1. Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.

2. Implement, and plan accordingly for, the necessary infrastructure to support the use of zero and near-zero emission technology vehicles and equipment that will be operating on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-duty trucks.

3. In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits such that emission reductions achieved equal or exceed that of a Tier 4 engine.

4. In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.

5. In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB’s lowest optional low-NOx standard starting in the year 2022.

1 In 2015, CARB adopted optional low-NOx emission standards for on-road heavy-duty engines. CARB's staff recommends engine manufacturers to eliminate new model engines that do not meet these standards. These standards are the toughest in the nation for new on-road heavy-duty diesel engines, and they are modeled after California's current heavy-duty engine emission standards. For more information about these standards, visit the CARB’s website at https://www.arb.ca.gov/air.helpers/airquality/06/NOxstandards.htm.

Attachment - 1
6. In construction contracts, include language that requires all construction equipment and fleets to be in compliance with all current air quality regulations. CARBS staff is available to assist in implementing this recommendation.

Recommended Operation Measures

1. Include contractual language in tenant lease agreements that requires tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.

2. Include contractual language in tenant lease agreements that requires all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units. This requirement will substantially decrease the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate at the project site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration are encouraged and can also be included lease agreements.

3. Include contractual language in tenant lease agreements that requires all TRUs entering the project site be plug-in capable.

4. Include contractual language in tenant lease agreements that requires future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.

5. Include contractual language in tenant lease agreements requiring all TRUs, trucks, and cars entering the Project site be zero-emission.

6. Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available.

7. Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the project site to be model year 2014 or later today, expedite a transition to zero-emission vehicles, and be fully zero-emission beginning in 2030.

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2 CARBS Technology Assessment for Transport Refrigeration provides information on the current and projected development of TRUs, including current and anticipated costs. This assessment is available at [https://www.cahw.ca.gov/transport/techreport/2020/06/20200615.pdf](https://www.cahw.ca.gov/transport/techreport/2020/06/20200615.pdf)

Attachment - 2
8. Include contractual language in tenant lease agreements that requires the tenant to be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB’s Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation,7 Periodic Smoke Inspection Program (FSIP),8 and the statewide Truck and Bus Regulation,9.

9. Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than five minutes while on site.

10. Include contractual language in tenant lease agreements that limits on-site TRU diesel engine runtime to no longer than 15 minutes. If no cold storage operations are planned, include contractual language and permit conditions that prohibit cold storage operations unless a health risk assessment is conducted and the health impacts are fully mitigated.

11. Include rooftop solar panels for each proposed warehouse to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.

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7 In December 2008, CARB adopted a regulation to reduce greenhouse gas emissions by improving the fuel-efficiency of heavy-duty (Tractor-Trailer) vehicles. The rule applies primarily to low-emitting vehicles. The rule applies to heavy-duty vehicles with annual or greater than annual average weekly average emission levels of 50 or more tons per year. The rule is available at: https://www.arb.ca.gov/vpd/announcements/20081203-08016.pdf.

8 Periodic Smoke Inspection Program (FSIP) requirements are available at: https://www.arb.ca.gov/vpd/announcements/20081203-08016.pdf.

9 The statewide Truck and Bus program requires that diesel and bus fleet owners conduct annual smoke opacity inspections of their vehicles and repair those with excessive smoke emissions to ensure compliance. CARB’s Truck and Bus Regulation is available at: https://www.arb.ca.gov/vpd/announcements/20081203-08016.pdf.

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Attachment - 3
Agency: City of Signal Hill  
Letter Code: A2  
Commenter: Colleen T. Doan  
Date: February 19, 2020

This comment summarizes the communication that the City of Signal Hill and the City of Long Beach have engaged in since 2018 during project planning related to design of city streets, signalization, project access, truck circulation, and related public improvements. As stated in the comment, the segment of Orange Avenue between Hill Street and Spring Street is within the jurisdiction of the City of Signal Hill. The City of Signal Hill’s issues are detailed in the following letter and addressed below.

The comment states that the City of Signal Hill cannot support the project as proposed and will not be able to issue permits for the proposed street improvements. However, since this letter was sent, the City of Signal Hill and the City of Long Beach have worked collaboratively to resolve issues related to proposed street improvements planned by the City of Long Beach on Orange Avenue and/or Spring Street and design discrepancies that do not concur with the City of Signal Hill’s General Plan, Circulation Element, and Bike Master Plan for these streets. See Appendix H to this Final EIR, which documents the agreement reached for circulation improvements between the cities of Long Beach and Signal Hill, as well as the City of Signal Hill’s support. Appendix H includes the City of Long Beach Public Works Department’s Technical Advisory Committee project requirements, the agreed upon refined conceptual street cross section for Orange Avenue, and email correspondence from the City of Signal Hill concurring with the changes.
A2-c The City of Signal Hill reviewed Section 3.5 Transportation of the Draft EIR and provides a list of comments below. This comment does not raise a substantive issue on the content of the Draft EIR. The comment will be made available for the decision makers. No further response is required.

A2-d This comment provides clarification on the posted speed limit on Spring Street. The speed limit varies along Spring Street. West of Orange Avenue the posted speed limit is 40 miles per hour and east of Orange Avenue the posted speed limit is 45 miles per hour. The text on page 3.5-1 of Section 3.5, Transportation, has been modified as follows:

- **Spring Street** is a four-lane, divided roadway oriented in the east-west direction. The speed limit is 40 miles per hour west of Orange Avenue and 45 miles per hour east of Orange Avenue. Parking is not permitted on either side of the roadway west of Orange Avenue; however, parking is permitted on both sides of the roadway east of Orange Avenue.

A2-e The comment states that Orange Avenue is currently 4 lanes from Spring Street to Willow Street. At the time of project initiation in 2018, Orange Avenue between Spring Street and 29th Street provided two northbound through lanes, a single southbound through lane, and a two-way left-turn lane. For the section of Orange Avenue between 29th Street and Willow Street, a single lane in both the northbound and southbound direction separated by a two-way left-turn land existed. It is acknowledged that recent improvements to Orange Avenue have resulted in the provision of two-lanes in each direction from Spring Street to Willow Street; however, the baseline conditions in the 2019 Traffic Impact Analysis (TIA) are not recommended to be updated, as the minor network modifications would not change the analysis or conclusions of the traffic study. The comment will be made available for the decision makers. No further response is required.
**A2-f** The comment recommends the level of service be re-verified based on comment A2-e. The level of service calculations provided in the 2019 TIA are accurate according to the baseline traffic conditions established upon initiation of the project. As a result of the recent roadway modifications on Orange Avenue, there is additional capacity through the study locations. Therefore, the conclusions in the 2019 TIA are considered to be conservative and worse case, and hence no revisions to the 2019 TIA are recommended. The comment will be made available for the decision makers. No further response is required.

**A2-g** This comment states that the City of Signal Hill is not supportive of a Class IV (Protected Bike Lane) bikeway or reducing the ultimate cross section of Orange Avenue from four lanes to two lanes which are a part of the City of Long Beach plans to implement a Class IV bikeway along Orange Avenue within the study area. However, based on recent collaborative efforts between both cities, a compromise has been reached (Appendix H), which allows for the following modifications to the intersection of Orange Avenue and Spring Street: provide two through lanes in the northbound and southbound directions, dual northbound left-turn lanes and a separate northbound right turn lane, while providing a single left-turn lane, a through and shared through-right turn lane on the southbound approach. As a result, this comment is no longer applicable. See the refined conceptual street cross section for Orange Avenue in Appendix H, prepared by the City of Long Beach and conceptually accepted by the City of Signal Hill with comments noted.

Further, the concept agreed upon between the cities was already considered as part of the 2019 TIA with the exception that a dedicated northbound right-turn lane is now included. Since this proposed improvement is considered to be a capacity enhancement to the prior plan, the findings identified in the 2019 TIA are considered conservative and worse case, and hence, no changes to
the 2019 TIA are recommended. The comment will be made available for the decision makers. No further response is required.

A2-h The comment states that a traffic signal is not warranted at the proposed project’s Orange Avenue Driveway. The 2019 TIA concluded that a traffic signal is not warranted at the project driveway along Orange Avenue; however, due to frequent truck utilization a signal was recommended to minimize conflicts with truck ingress/egress and other motorists. The City of Signal Hill is not in support of signalizing this intersection. Since the 2019 TIA identifies that there is adequate storage and service levels to accommodate added demand, the City of Long Beach and the City of Signal Hill recommend that the project driveway located along Orange Avenue be constructed as an unsignalized intersection. As shown on the refined conceptual street cross section in Appendix H, the northbound direction would provide a dedicated left-turn lane and two through lanes. The southbound direction consists of a through lane and a shared through/right turn lane. The outbound direction will consist of a shared left/right turn lane. As shown in the LOS worksheets in Appendix H, the resulting service levels for buildout plus project traffic conditions are forecast to operate at LOS C for both the AM and PM peak hour. Therefore, traffic into and out of the project driveway on Orange Avenue will function adequately without undue congestion.

The text on page 2-5 of Chapter 2, Project Description, has been revised to remove reference to the two-phase traffic signal at the project driveway at Orange Avenue.

A2-i The comment states that a discussion of impacts to the trip distribution and intersections caused by the removal of the traffic signal in comment A2-h is needed and states that trucks should be rerouted from Orange Avenue since Orange Avenue is not a truck route. Because the project driveway located along Orange Avenue is now proposed to be an unsignalized driveway (and turn movements are not expected to be restricted), during the weekday
commute hours truck-related traffic may choose to turn right when exiting the site instead of turning left due to traffic flow on Orange Avenue. Additionally, truck traffic may choose to exit the site via the driveway on Spring Street. This potential change in exiting patterns as a result of removing the previously proposed traffic signal at the project’s main entrance, would result in up to 17 peak hour truck trips having to alter their exiting pattern from what was reported in the 2019 TIA. This change (one trip every three minutes over the peak hour) is considered nominal and would have little effect on the surrounding street system and not likely affect the operating conditions of the study intersections as reported in the 2019 TIA. Therefore, no changes to the 2019 TIA have been made.

It is not uncommon for industrial uses to have access off roads that are not classified as a truck route. In general, the jurisdiction will typically allow trucks to utilize these facilities to allow for direct access to other truck routes and/or access to the freeway system. As such, the applicant will work with the City of Long Beach and City of Signal Hill to ensure trucks utilize all truck routes and take the most direct route to/from the project driveways. The comment will be made available for the decision makers. No further response is required.

A2-j The comment states that if left turns are permitted at the Orange Avenue driveway, then a northbound dual left turn on Orange Avenue at Spring Street may be required. The refined conceptual street cross section agreed upon between the City of Long Beach and City of Signal Hill (Appendix H) includes dual northbound left-turn lanes at Orange Avenue and Spring Street. Therefore, this comment is no longer applicable based on the refined conceptual street cross section (Appendix H). The comment will be made available for the decision makers. No further response is required.

A2-k Please see response to comment A2-h and A2-j regarding the traffic signal and truck routes.
| A2-I | This comment states that an analysis of the Spring Street and Orange Avenue intersection is needed because of the rerouting of truck traffic to northbound Orange Avenue. As a result of the refined conceptual street cross section agreed upon between the City of Long Beach and City of Signal Hill this comment is no longer valid (Appendix H). No changes to the 2019 TIA are recommended. The comment will be made available for the decision makers. No further response is required. |
| A2-m | The comment states that a discussion of the truck distribution is needed to fully understand the project impacts on the roadway system. Truck distribution for the project is forecast to be freeway focused. As a result, the truck distribution pattern presented in the 2019 TIA shows that 40% of the inbound/outbound trips utilizing the western region via I-405 and 40% of the inbound/outbound trips utilizing the eastern region via I-405. Additionally, the 30% traveling along Spring Street is anticipated to use this street as a freeway by-pass but are anticipated to access the I-405 further down the street. No changes to the 2019 TIA are recommended. The comment will be made available for the decision makers. No further response is required. |
| A2-n | This comment clarifies the proposed City of Signal Hill bike facilities in the study area. Per the City of Signal Hill Bicycle Master Plan, a Class II bike lane is proposed on Orange Avenue south of Spring Street, a Class II bike lane is proposed on Spring Street, and a Class III bike route is proposed on Orange Avenue north of Caltrans ROW within the City of Signal Hill. The text on page 3.5-2 of Section 3.5, Transportation, has been modified as follows:

Both the City of Long Beach and the City of Signal Hill classify Orange Avenue as a Class III bikeway; however, the City of Signal Hill specifies the Class III bikeway is north of the Caltrans ROW within the City. |
of Signal Hill and classifies Orange Avenue as a Class II bike lane south of Spring Street.

**A2-o** This comment requests a transition of bike facilities to have appropriate signage. As a result of the refined conceptual street cross section agreed upon between the City of Long Beach and City of Signal Hill this comment is no longer valid (Appendix H). No changes to the 2019 TIA are recommended. The comment will be made available for the decision makers. No further response is required.
the class 4 lane to a sharing a travel lane with vehicles. In a posted 40 MPH zone, the City of Signal Hill does not support the construction of the southbound Class 4 along the project frontage at this time.
13. All street lanes in the City of Signal Hill shall be 12 feet, medians shall be 14 feet.

**LLG Traffic Impact Study**

1. Page 7: the project discussion shall be revised to reflect the current lane configuration of 4 lanes (two lanes in each direction) with a two-way left turn (or, left turn pocket) median.
2. Page 8: note that the traffic counts were taken during college summer recess and no adjustments were added.
3. Page 13: Table 3-4, Intersection 9 – Cherry and Spring LDS is inconsistent with other recent traffic studies. This intersection typically has a LOS of C/D.
4. Page 15: Section 5.2, the trip distribution shows trucks going south on Orange Avenue. This is not a truck route and shall be amended.

If you have any questions, please do not hesitate to contact me at 714-799-1700 ext. 100.

Respectfully submitted,

W.G. Zimmerman Engineering, Inc.

Bill Zimmerman PE, TE, PTOE
President

CC: Kelly Tancredi, Public Works Director, Signal Hill
Steve Badum, City Engineer, Signal Hill
Carl Hickman, City Traffic Engineer, Long Beach
Josh Hickman, Traffic Engineer, Long Beach

**A2-o Contd.**

**A2-p**

The comment requests specific widths for street lanes and medians. As a result of the refined conceptual street cross section agreed upon between the City of Long Beach and City of Signal Hill this comment is no longer valid (Appendix H). No changes to the 2019 TIA are recommended. The comment will be made available for the decision makers. No further response is required.

**A2-q**

Please see response to comment A2-e. Section 3.1 of the 2019 TIA is intended to be used as a general reference for roadway characteristics. Given the recent roadway conditions on Orange Avenue results in additional capacity through the study locations, the conclusions in the 2019 TIA are considered to be conservative and worse case, and hence no revisions to the 2019 TIA are recommended. The comment will be made available for the decision makers. No further response is required.

**A2-r**

The comment states the traffic counts in the 2019 TIA were conducted during college summer recess. The counts in the 2019 TIA were conducted in March and May 2018 while nearby schools and colleges were still in session. No changes to the 2019 TIA are recommended. The comment will be made available for the decision makers. No further response is required.

**A2-s**

The comment states the level of service at the intersection of Cherry Avenue and Spring Street is incorrect. The traffic consultant reviewed the level of service results for Cherry Avenue at Spring Street and concluded the results are considered adequate based on existing traffic counts, current intersection configuration, and the ICU method of analysis. No changes to the 2019 TIA are recommended. The comment will be made available for the decision makers. No further response is required.

**A2-t**

The comment states that Orange Avenue is not a truck route and suggests the trip distribution be revised. Willow Street is considered a truck route that could be used to
service the site. Similar to response to comment A2-i, it is not uncommon for industrial uses to have access off roads that are not classified as a truck route. In general, the jurisdiction will typically allow trucks to utilize these facilities to allow for direct access to other truck routes. As such, the applicant will work with the City of Long Beach and City of Signal Hill to ensure trucks utilize all truck routes and take the most direct route to/from the project driveways. No changes to the 2019 TIA are recommended. The comment will be made available for the decision makers. No further response is required.
December 12, 2019
Mr. Scott Kinsey
Long Beach Development Services
413 W. Ocean Blvd., 3rd Floor
Long Beach, CA 90802

Re: Orange Avenue and Spring Street Intersection Improvements

Dear Mr. Kinsey:

We have reviewed the Orange Avenue and Spring Street Proposed Alternatives plans: 12-1, 12-2, and 12-3. Additionally, we compared these plans to the City of Signal Hill’s concept plan for the intersection since Orange Avenue is a City of Signal Hill street between Hill Street and Spring Street.

We understand that these plans will be used for the environmental document for the site located at the southwest corner of the intersection of Orange Avenue and Spring Street. However, the City of Signal Hill cannot support any of the alternatives for the environmental document for the following reasons:

1. The Alternatives presented do not concur with the City’s General Plan for Orange Avenue and Spring Street. The City’s Circulation Element’s Bike Master Plan includes Orange Avenue as a Class 3 Bike Route and Spring Street as a Class 2 Bike Lane.
2. The City’s concept plan for Orange Avenue and the intersection of Orange Avenue and Spring Street includes widening of Orange Avenue for two northbound and southbound travel lanes with Class 2 Bike lanes. At the intersection of Orange Avenue and Spring Street, the northbound direction includes dual left turn lanes with approximately 200 feet of storage, two thru lanes, and a right turn lane. The minimum lane widths include 11 feet for the left turn pocket, 12 feet for the thru lanes, 18 feet for the right turn lane, and 5 feet for the Class 2 Bike lanes. Spring Street will include a Class 2 Bike Lane and a parking lane. All three of the Development’s Alternatives do not meet these standards.
3. The signal warrants provided in the Traffic Study for the project do not require a traffic signal at the driveway for the development south of Spring Street. In addition, the proposed signal location to the intersection signal at Spring Street would cause a safety concern with possible traffic backing up into the intersection for Spring Street for southbound Orange Avenue traffic.
4. The Spring Street bike lane and travel lanes width do not conform to the proposed Class 2 bike lane with parking. Spring Street east of Orange Avenue is within the City of Signal Hill, with the exception of the north curb face and adjacent street parking. The City of Signal Hill is planning on installing a Class 2 bike lane and a parking lane from Orange Avenue to Jarigato Avenue.
5. Alternative 12-3 does not meet the City Development requirements of “full or half” roadway build-out along the frontage of the development.

Each Alternative is specifically addressed below:

Alternative 12-1
- A traffic signal is proposed at the driveway of the development on Orange Avenue. The traffic signal is not warranted and may cause a traffic safety concern because of the proximity to the signalized intersection of Orange Avenue and Spring Street. The City will not endorse a traffic signal at this location.

A2-u
See responses to comments A2-b through A2-t above. Given the refined conceptual street cross section for Orange Avenue has been developed and agreed upon by both the City of Long Beach and City of Signal Hill, the comments noted are no longer applicable (Appendix H). The comment will be made available for the decision makers. No further response is required.
The skewed angle of the southbound lanes (north of the Spring Street intersection) across the intersection to Orange Avenue is south of the intersection is very severe and does not meet the Caltrans Highway Design Manual for frost. The proposed street width must meet the City's minimum requirements proposed in the City Concept Plan for Orange Avenue. The City of Signal Hill does not have a northbound and southbound lanes on Orange Avenue. The City of Signal Hill does not use Class 4 bike lanes only Class 2, and Class 3 bike lanes.

The Alternative 2-2

- A traffic signal is proposed at the intersection of the development on Orange Avenue. The traffic signal is not warranted and may cause traffic congestion because of the proximity to the intersection of Orange Avenue and Spring Street. The City will not endorse a traffic signal at this location.
- The proposed Class 4 Bike lanes on both Orange Avenue and Spring Street to not conform to the City's General Plan. The City of Signal Hill does not use Class 4 Bike lanes only Class 2, and Class 3 Bike lanes.
- Two northbound and two southbound lanes on Orange Avenue are required. This Alternative does not meet the standard.
- The Alternative does not meet the left turn pocket length of 200 feet of storage length.

The Alternative 2-3

- A traffic signal is proposed at the intersection of the development on Orange Avenue. The traffic signal is not warranted and may cause traffic congestion because of the proximity to the intersection of Orange Avenue and Spring Street. The City will not endorse a traffic signal at this location.
- The proposed Class 4 Bike lanes on both Orange Avenue and Spring Street to not conform to the City's General Plan. The City of Signal Hill does not use Class 4 Bike lanes only Class 2, and Class 3 Bike lanes.
- Two northbound and two southbound lanes on Orange Avenue are required. This Alternative does not meet the standard.
- The Alternative does not meet the left turn pocket length of 200 feet of storage length.
- The proposed southbound stop at the intersection on Orange Avenue. The Alternative does not meet the left turn pocket length of 200 feet of storage length.

If you have any questions, please do not hesitate to contact me at 714-799-1700 ext. 100.

Respectfully submitted,

W.G. Zimmerman Engineering, Inc.

Bill Zimmerman, PE, TE, PTOE
President

CC:
Kelli Tumey, Director, Public Works
Steve Badger, City Engineer, Signal Hill
Carla McGee, City Traffic Engineer, Long Beach
Josh Hickman, Traffic Engineer, Long Beach

W.G. Zimmerman Engineering, Inc.
17701 Beach Boulevard, Suite 1740
Huntington Beach, CA 92647
Phone: 714-999-1700 Fax: 714-335-1712
Agency: California Department of Transportation (Caltrans)
Letter Code: A3
Commenter: Miya Edmonson
Date: February 20, 2020

A3-a This comment summarizes the project description and identifies the nearest State facilities to the proposed project. The comment also summarizes the discussions between Caltrans, the City of Long Beach, the environmental consultant, and the transportation consultant. This comment does not raise a substantive issue on the content of the Draft EIR. The comment will be made available for the decision makers. No further response is required.

A3-b The comment summarizes the queuing and blocking analysis worksheets for the Orange Avenue and Spring Street intersection. The results of the intersection analysis for Orange Avenue at Spring Street, as reported in the appendix materials to the 2019 TIA, do indicate that forecast vehicular queues lengths with or without the implementation of the City of Long Beach proposed Orange Avenue Bikeway Improvements project would extend past the Orange Avenue and I-405 Southbound Ramps intersection (i.e. Intersection 3). The issue raised in this comment is further addressed in responses to comments A3-c and A3-d below.

A3-c The comment is in support of installing a three-phase traffic signal at the intersection of Orange Avenue and I-405 Southbound Ramps to mitigate the impact identified in comment A3-b. The installation of a three-phase traffic signal was identified in the Draft EIR as Mitigation Measure TRAN-4 without Orange Avenue Bikeway Improvements and Mitigation Measure TRAN-5 with Orange Avenue Bikeway Improvements. The Draft EIR concluded that these mitigation measures would reduce the impact; however, Mitigation Measures TRAN-4 and TRAN-5 are
subject to approval by and are the responsibility of another agency (Caltrans) and that such improvements are within the responsibility and jurisdiction of another public agency and not the City of Long Beach, these impacts are considered significant and unavoidable.

Caltrans suggestion that the project developer work with the state on developing a mitigation agreement for contributing 12.43% towards the installation of a traffic signal at this location will be provided to the decision makers and the project applicant for consideration. However, since these improvements are not currently planned or funded, the conclusions in the EIR remain significant and unavoidable. Furthermore, no such Caltrans fee program supported by a proper nexus-study exists at this time.
The comment encourages the City of Long Beach to work with Caltrans on identifying additional mitigation measures that could be implemented to decrease the potential of vehicular queues on the I-405 SB off-ramp from backing up onto the I-405 Freeway, including signal timing modification. The comment will be made available for the decision makers. No further response is required.

The comment provides additional information for consideration including additional Transportation Demand Management (TDM) strategies. The comment acknowledges the TDM strategies already proposed as part of the project, including sidewalk improvements in the study area and providing no more parking than required. The comment will be made available for the decision makers. No further response is required.

The comment states that any transportation of heavy construction equipment or materials which require use of oversized-transportation vehicles on state highways would need a Caltrans transportation permit. The comment recommends large size truck trips be limited to off-peak commute periods. The comment further states that an encroachment permit is required for projects on or near Caltrans ROW.

Caltrans oversized vehicle permits are standard and apply to any operator traveling on Caltrans facilities and the issue is not applicable to the CEQA impact analysis process; however, the applicant will comply with Caltrans regulations and apply for applicable permits. Further, the applicant will follow best practices for off-peak deliveries and large size truck trips.

The comment also states that stormwater is a sensitive issue for Los Angeles County. Mitigation Measure HWQ-1 would be implemented, which requires compliance with NPDES requirements and local regulations.
A4-a This comment summarizes the project description. This comment does not raise a substantive issue on the content of the Draft EIR. The comment will be made available for the decision makers. No further response is required.

A4-b Please see response to comment A1-c for a detailed health risk assessment of the proposed project's construction and operational emissions.

A4

A4-a

A4-b
This comment states that the lead agency, the City of Long Beach, should respond to all comments pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b). A good faith, reasoned analysis has been provided in this Response to Comments chapter of the Final EIR. This comment does not raise a substantive issue on the content of the Draft EIR. The comment will be made available for the decision makers. No further response is required.

Sincerely,

Lisa San
Program Supervisor, CEQA EIR
Planning, Rule Development & Area Sources

LS
LAC20220055
Control Number
Organization: Gabrieleno Band of Mission Indians – Kizh Nation  
Letter Code: O1  
Commenter: Andrew Salas  
Date: January 10, 2020  

O1-a Tribal cultural resources and the communication with Chairman Salas are discussed in Section XVIII of the Initial Study and documented in Appendix C to the Initial Study (Appendix A to the Draft EIR). Chairman Salas reviewed the mitigation measures in March of 2019 and the cultural resources mitigation measures reflect input from the Gabrieleno Band of Mission Indians.
The comment documents the correspondence between Chairman Salas and the City of Long Beach. The Gabrieleno Band of Mission Indians – Kizh Nation accepted the mitigation measures and AB 52 Consultation is concluded.

O1-b

Scott Kinsey, AICP
Planner V

Long Beach Development Services | Planning Bureau
411 W. Ocean Blvd., 3rd Fl. | Long Beach, CA 90802
Office: 562-570-6651

From: Administration.Gabrieleno<admin@gabrielеноindians.org>
Sent: Thursday, January 30, 2020 12:00 AM
To: Matthew Teutlemer <Matthew.Teutlemer@gabrielеноindians.org>; Scott Kinsey <Scott.Kinsey@longbeach.gov>
Subject: Re: Spring St. Business Park Project located: 2851 Orange Ave Long Beach CA

Hello Scott,

Thank you for your response. We agree to the mitigation's in section TCR-1 great job. Thank you.

Tribal Cultural Resources

TCR-1: Native American Monitoring

Prior to issuance of any Grading Permit for the project, the Project

On Tue, Jan 21, 2020 at 2:28 PM Scott Kinsey <Scott.Kinsey@longbeach.gov> wrote:

Hello,

Please see the attached, which we received from you around 3/14/19 on this project.

I am also attaching the mitigation monitoring and reporting program (MMRP) that implemented the mitigation measures we agreed upon for the project at 1500 E. Anaheim St. We are using the same environmental consultant for this project and plan to use the same set of cultural/tribal cultural mitigation measures.

Please let me know if this sounds okay to you.

Jenny,

Per the below, we are good on AB-52 tribal consultation for the project.

Scott Kinsey, AICP
Planner V

Long Beach Development Services | Planning Bureau
411 W. Ocean Blvd., 3rd Fl. | Long Beach, CA 90802
Office: 562-570-6651

From: Scott Kinsey
To: Matthew Teutlemer, Matthew.Teutlemer@gabrielenoindians.org
Subject: Re: Spring St. Business Park Project located: 2851 Orange Ave Long Beach CA

Hello,

Can you please send me a copy of your response? I am waiting on the status of the AB-52 tribal consultation.

Scott Kinsey

From: Administration.Gabrieleno<admin@gabrielenoindians.org>
Sent: Thursday, January 30, 2020 7:45:38 AM
To: Matthew Teutlemer <Matthew.Teutlemer@gabrielenoindians.org>; Scott Kinsey <Scott.Kinsey@longbeach.gov>
Subject: Re: Spring St. Business Park Project located: 2851 Orange Ave Long Beach CA

Jenny,

Per the below, we are good on AB-52 tribal consultation for the project.

Scott Kinsey, AICP
Planner V

Long Beach Development Services | Planning Bureau
411 W. Ocean Blvd., 3rd Fl. | Long Beach, CA 90802
Office: 562-570-6651

From: Administration.Gabrieleno<admin@gabrielenoindians.org>
Sent: Thursday, January 30, 2020 12:00 AM
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Subject: Re: Spring St. Business Park Project located: 2851 Orange Ave Long Beach CA

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Tribal Cultural Resources

TCR-1: Native American Monitoring

Prior to issuance of any Grading Permit for the project, the Project

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I am also attaching the mitigation monitoring and reporting program (MMRP) that implemented the mitigation measures we agreed upon for the project at 1500 E. Anaheim St. We are using the same environmental consultant for this project and plan to use the same set of cultural/tribal cultural mitigation measures.

Please let me know if this sounds okay to you.
Regards,

Scott Kinsky, AICP
Planner V

Long Beach Development Services | Planning Bureau
411 W. Ocean Blvd, 3rd Fl. | Long Beach, CA 90802
Office: 562-570-6451
Email: Scott.Kinsky@longbeach.gov

From: Administration Gabrieleno <admin@gabrielenoindians.org>
Sent: Friday, January 17, 2020 1:42 PM
To: Scott Kinsky <Scott.Kinsky@longbeach.gov>
Subject: Re: Spring St. Business Park Project located: 2851 Orange Ave Long Beach CA

Good afternoon Scott

Thank you for your email, can you please resend the mitigation we provided on the last project so that Mr. Salas can review them.

Thank you

Admin Specialist
Gabrieleno Band of Mission Indians - Kiich Nation
PO Box 303
Covina, CA 91723
Office: 844-390-0787
Website: www.gabrielenoindians.org

Attachments area

On Fri, Jan 17, 2020 at 11:52 AM Scott Kinsky <Scott.Kinsky@longbeach.gov> wrote:

Hello,

Thank you for your correspondence. I would like to take a minute to explain this one, as you might have noticed the address sounds familiar to something you have already seen from us.

The project has not changed from the project you saw previously. It is still approximately 190,000
In response to your comments on the Spring Street Business Park Project, a total of 78,936 sq ft of new light industrial development in three buildings on a 7.5-acre site. However, due to potentially significant impacts to traffic and transportation, it became necessary to prepare an Environmental Impact Report (EIR) instead of the Mitigated Negative Declaration (MND) that we had previously consulted about.

Since there are no changes to any impacts in the Cultural Resources and Tribal Cultural Resources sections, we are proposing to use the same mitigation measures for Cultural Resources and Tribal Cultural Resources that we had consulted with you and agreed upon for the MND. These are additionally the same mitigation measures we consulted and agreed upon for the project at 1300 E. Anaheim St. in Long Beach. Will this be acceptable to you? Please let me know.

Sincerely,

Scott Kinsey, AICP
Planner V
Long Beach Development Services | Planning Bureau
411 W. Ocean Blvd, 9th Fl | Long Beach, CA 90802
Office: 562-570-6463
Email: skinsey@longbeach.gov

From: Administration Gabrieleno <admin@gabrielenoindians.org>
Sent: Friday, January 10, 2020 3:19 PM
To: Scott Kinsey <skinsey@longbeach.gov>
Subject: Spring St. Business Park Project located: 2351 Orange Ave, Long Beach CA

Hello Scott Kinsey,

Please see attachments.

Thank you,

Sincerely,

Brandy Salas
Admin Specialist
Gabrieleno Band of Mission Indians - Kizh Nation
PO Box 390
Covina, CA 91723
Office: 844-306-0787
website: www.gabrielenoindians.org

Attachments area

Admin Specialist
Gabrieleno Band of Mission Indians - Kizh Nation
PO Box 393
Covina, CA 91723
Office: 626-339-0787
website: www.gabrielenoindians.org

Attachments area
Organization: Supporters Alliance for Environmental Responsibility
Letter Code: O2
Commenter: Richard Drury
Date: January 29, 2020

O2-a This comment states the commenter is writing on behalf of Supporters Alliance for Environmental Responsibility and summarizes the Draft EIR Project Description. This comment does not raise a substantive issue on the content of the Draft EIR. The comment will be made available for decision makers. No further response is required.

O2-b The comment letter claims the Draft EIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the project’s impacts. However, the commenter fails to provide any details to support his assertion that the Draft EIR fails as an informational document and fails to impose feasible mitigation measures. To the contrary, the Draft EIR fully complies with CEQA and imposes all feasible mitigation measures. Recirculation of the Draft EIR is not warranted and no further response is required.
January 29, 2020
Comment on Draft Environmental Impact Report for Spring Street Business Park Project
(SCH No. 2019100314)
Page 2 of 2

Sincerely,

[Signature]
Richard Deary
8.4 Additional Changes

Additional minor changes have been made to reflect continued city review of the development application and related project plans, including site plan refinements and to provide more clarification to existing analyses in the EIR related to air quality and transportation. The minor changes to the project description reflect refinement of the project design by the project applicant and description of offsite improvements within the City of Signal Hill’s jurisdiction which reflect the coordination of proposed improvements between the City of Long Beach and City of Signal Hill. Further, the air quality emissions estimates were adjusted to reflect a later construction start date than was originally included in the Draft EIR. Finally, additional clarifying language has been added to the transportation section regarding the mitigation measures identified in the Draft EIR as infeasible. Changes to the Draft EIR are documented by showing deletions with strikethrough and additions with underline. None of these minor changes affect the conclusions of the Draft EIR.

Executive Summary, page ES-3:

Therefore, such improvements are within the responsibility and jurisdiction of another public agency and not the City of Long Beach and as such, Mitigation Measure TRAN-1 is potentially legally infeasible under CEQA Guidelines 15091(a)(2) and Section 15091(a)(3). Only feasible mitigation measures can be legally imposed pursuant to CEQA Guidelines Section 15091(d), Section 15097(a), and Section 15126.4(a)(5). Therefore, the impact at Orange Avenue and 32nd Street during PM peak hours is considered significant and unavoidable. If the City of Signal Hill approves and permits the work required by this mitigation measure, the City of Long Beach shall review the approval and permitted scope of work to determine if it is “feasible” for the purposes of CEQA.

Executive Summary, page ES-3 to ES-4:

Therefore, such improvements are within the responsibility and jurisdiction of another public agency and not the City of Long Beach, and Mitigation Measures TRAN-4 and TRAN-5 are potentially legally infeasible under CEQA Guidelines 15091(a)(2) and Section 15091(a)(3). Only feasible mitigation measures can be legally imposed pursuant to CEQA Guidelines Section 15091(d), Section 15097(a), and Section 15126.4(a)(5). Therefore, these impacts are considered significant and unavoidable. If Caltrans approves and permits the work required by this mitigation measure, the City of Long Beach shall review the approval and permitted scope of work to determine if it is “feasible” for the purposes of CEQA.

Chapter 2, Project Description, page 2-4:

All three buildings would be 45 feet in height. Building 1 and 2 would be 28 feet in height and Building 3 would be 30 feet in height.

Chapter 2, Project Description, page 2-5:

- **With Orange Avenue Bikeway Improvements** – To provide full access to the project site, the applicant would install an unsignalized project driveway two-phase traffic signal with permissive phasing for the northbound left turn lane. The signal is proposed approximately 260 feet south of Spring Street along Orange Avenue. The applicant would modify the northbound approach to accommodate a 100-foot left-turn lane and one through lane. For the eastbound approach, the applicant would install a shared left/right turn lane.
improvements are subject to the approval of the City of Long Beach and/or the City of Signal Hill.

- **Without Orange Avenue Bikeway Improvements** – To provide full access to the project site install an unsignalized project driveway approximately 260 feet south of Spring Street along Orange Avenue, a two-phase traffic signal with permissive phasing for the northbound left-turn lane. The applicant would modify the northbound approach to accommodate a 100-foot left-turn lane and two through lanes. For the eastbound approach, the applicant would install a shared left/right turn lane. These improvements are subject to the approval of the City of Long Beach and/or the City of Signal Hill.

Chapter 2, Project Description, page 2-9:

Orange Avenue would have a 40-foot wide roadway and 408-foot wide sidewalk (5-foot-wide sidewalk and 3-foot-wide parkway area) located on both sides of the roadway, 6-foot-wide bike lane, and a 6-foot-wide median within the 20-foot dedication area. Immediately south of the Spring Street intersections, improvements would include a 5-foot sidewalk, a 7-foot-wide bike lane, and an 8-foot-wide median to accommodate a bus stop. An additional 2 feet of sidewalk would be provided in the vicinity of the bus stop on Orange Avenue adjacent to the project site, achieving a 12-foot-wide public sidewalk. Unused driveways and curb cuts would be replaced with full-height curb, curb gutter, and sidewalk. The existing sidewalk and curb ramps located at the southwest, northwest, and northeast corners of Orange Avenue and Spring Street would be demolished and new Americans with Disabilities Act compliant curb ramps would be constructed.

The existing crosswalks at the intersection of Orange Avenue and Spring Street would be upgraded to continental style crosswalks, using thermoplastic materials, per the latest City of Long Beach standards, as approved by the City Traffic Engineer.

Section 3.1, Air Quality, page 3.1-16 through 3.1-18:

The CalEEMod emission model runs in the Draft EIR assumed construction would occur in 2019 and 2020. The CalEEMod emission model runs were updated to assume construction would occur in 2021 and 2022. In Section 3.1, Air Quality, Table 3.1-6, Table 3.1-7, Table 3.1-8, and Table 3.1-9 were updated to include the results of the updated model runs. The updated CalEEMod model run results are included in Appendix G.

Section 3.3, Greenhouse Gas Emissions, page 3.3-7 through 3.3-8:

The CalEEMod calculations for GHG emissions in the Draft EIR assumed construction would occur in 2019 and 2020. The CalEEMod emission model runs were updated to assume construction would occur in 2021 and 2022. In Section 3.3, Greenhouse Gas Emissions, Table 3.3-3 and Table 3.3-4 were updated to include the results of the updated model runs. Additionally, the text was revised to match the updated MT of CO2e in the tables. The updated CalEEMod model run results are included in Appendix G.

Section 3.5, Transportation, page 3.5-11:

Due to the fact that Mitigation Measures TRAN-1 is the responsibility of and is subject to approval by the City of Signal Hill, and that such improvements are within the responsibility and jurisdiction of another public agency and not the City of Long Beach, Mitigation Measure TRAN-1 is potentially legally infeasible under CEQA Guidelines 15091(a)(2) and Section 15091(a)(3). Only feasible mitigation measures can be legally imposed pursuant to CEQA
Guidelines Section 15091(d), Section 15097(a), and Section 15126.4(a)(5). Therefore, the impact at Orange Avenue and 32nd Street during PM peak hours is considered remains significant and unavoidable. If the City of Signal Hill approves and permits the work required by this mitigation measure, the City of Long Beach shall review the approval and permitted scope of work to determine if it is “feasible” for the purposes of CEQA.

Section 3.5, Transportation, page 3.5-12:

Due to the fact that Mitigation Measures TRAN-1 is the responsibility of and is subject to approval by the City of Signal Hill, and that such improvements are within the responsibility and jurisdiction of another public agency and not the City of Long Beach, Mitigation Measure TRAN-1 is potentially legally infeasible under CEQA Guidelines 15091(a)(2) and Section 15091(a)(3). Only feasible mitigation measures can be legally imposed pursuant to CEQA Guidelines Section 15091(d), Section 15097(a), and Section 15126.4(a)(5). Therefore, the impact at Orange Avenue and 32nd Street during PM peak hours is considered remains significant and unavoidable. If the City of Signal Hill approves and permits the work required by this mitigation measure, the City of Long Beach shall review the approval and permitted scope of work to determine if it is “feasible” for the purposes of CEQA.

Section 3.5, Transportation, page 3.5-13:

Due to the fact that Mitigation Measures TRAN-4 and TRAN-5 are subject to approval by and are the responsibility of another agency (Caltrans) and that such improvements are within the responsibility and jurisdiction of another public agency and not the City of Long Beach, Mitigation Measures TRAN-4 and TRAN-5 are potentially legally infeasible under CEQA Guidelines 15091(a)(2) and Section 15091(a)(3). Only feasible mitigation measures can be legally imposed pursuant to CEQA Guidelines Section 15091(d), Section 15097(a), and Section 15126.4(a)(5). Therefore, these impacts are considered remain significant and unavoidable. If Caltrans approves and permits the work required by this mitigation measure, the City of Long Beach shall review the approval and permitted scope of work to determine if it is “feasible” for the purposes of CEQA.

Section 3.5, Transportation, page 3.5-23:

Due to the fact that Mitigation Measures TRAN-1 is the responsibility of and is subject to approval by the City of Signal Hill, and that such improvements are within the responsibility and jurisdiction of another public agency and not the City of Long Beach, Mitigation Measure TRAN-1 is potentially legally infeasible under CEQA Guidelines 15091(a)(2) and Section 15091(a)(3). Only feasible mitigation measures can be legally imposed pursuant to CEQA Guidelines Section 15091(d), Section 15097(a), and Section 15126.4(a)(5). Therefore, the impact at Orange Avenue and 32nd Street during PM peak hours is considered remains significant and unavoidable. If the City of Signal Hill approves and permits the work required by this mitigation measure, the City of Long Beach shall review the approval and permitted scope of work to determine if it is “feasible” for the purposes of CEQA.

Section 3.5, Transportation, page 3.5-24:

Due to the fact that Mitigation Measures TRAN-1 is the responsibility of and is subject to approval by the City of Signal Hill, and that such improvements are within the responsibility and jurisdiction of another public agency and not the City of Long Beach, Mitigation Measure TRAN-1 is potentially legally infeasible under CEQA Guidelines 15091(a)(2) and Section 15091(a)(3). Only feasible mitigation measures can be legally imposed pursuant to CEQA
Guidelines Section 15091(d), Section 15097(a), and Section 15126.4(a)(5). Therefore, the impact at Orange Avenue and 32nd Street during PM peak hours is considered significant and unavoidable. If the City of Signal Hill approves and permits the work required by this mitigation measure, the City of Long Beach shall review the approval and permitted scope of work to determine if it is “feasible” for the purposes of CEQA.

Section 3.5, Transportation, page 3.5-24:

Due to the fact that Mitigation Measures TRAN-4 and TRAN-5 are subject to approval by and are the responsibility of another agency (Caltrans) and that such improvements are within the responsibility and jurisdiction of another public agency and not the City of Long Beach, these mitigation measures are potentially infeasible pursuant to CEQA Guidelines 15091(a)(2) and Section 15091(a)(3). Only feasible mitigation measures can be legally imposed pursuant to CEQA Guidelines Section 15091(d), Section 15097(a), and Section 15126.4(a)(5). Therefore, impacts are considered significant and unavoidable. If Caltrans approves and permits the work required by this mitigation measure, the City of Long Beach shall review the approval and permitted scope of work to determine if it is “feasible” for the purposes of CEQA.

Section 3.5, Transportation, page 3.5-24 to 3.5-25:

Mitigation Measures TRAN-1, TRAN-4, and TRAN-5 are potentially infeasible because they are subject to approval by and are the responsibility of another agency and not the City of Long Beach. If the agency responsible for approval determines the measures are infeasible, then the measures would not be imposed by the City of Long Beach. Because Mitigation Measures TRAN-1, TRAN-4, and TRAN-5 are within the responsibility and jurisdiction of another agency, they are potentially infeasible pursuant to CEQA Guidelines 15091(a)(2) and Section 15091(a)(3). Only feasible mitigation measures can be legally imposed pursuant to CEQA Guidelines Section 15091(d), Section 15097(a), and Section 15126.4(a)(5). If Caltrans and/or the City of Signal Hill approves and permits the work required by these mitigation measures, the City of Long Beach shall review the approval and permitted scope of work to determine if it is “feasible” for the purposes of CEQA.

Section 3.5, Transportation, page 3.5-26:

Therefore, such improvements are within the responsibility and jurisdiction of another public agency and not the City of Long Beach and as such, Mitigation Measure TRAN-1 is potentially legally infeasible under CEQA Guidelines 15091(a)(2) and Section 15091(a)(3). Only feasible mitigation measures can be legally imposed pursuant to CEQA Guidelines Section 15091(d), Section 15097(a), and Section 15126.4(a)(5). Therefore, the impact at Orange Avenue and 32nd Street during PM peak hours is considered significant and unavoidable. If the City of Signal Hill approves and permits the work required by this mitigation measure, the City of Long Beach shall review the approval and permitted scope of work to determine if it is “feasible” for the purposes of CEQA.
Section 3.5, Transportation, page 3.5-26:

Therefore, such improvements are within the responsibility and jurisdiction of another public agency and not the City of Long Beach, and Mitigation Measures TRAN-4 and TRAN-5 are potentially legally infeasible under CEQA Guidelines 15091(a)(2) and Section 15091(a)(3). Only feasible mitigation measures can be legally imposed pursuant to CEQA Guidelines Section 15091(d), Section 15097(a), and Section 15126.4(a)(5). Therefore, these impacts are considered remain significant and unavoidable. If Caltrans approves and permits the work required by this mitigation measure, the City of Long Beach shall review the approval and permitted scope of work to determine if it is “feasible” for the purposes of CEQA.
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